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DOUGLAS B. McFADDEN (DC, NY)

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May 23, 2014

VIA FAX TRANSMISSION AND E-FILE

Hon. Joel Schneider

U.S. District Court for the District of New Jersey

401 Market Street,

Camden, NJ 08102

Re: Astero v. Talk Radio Network Entertainment, Inc., 13 cv 06005- NLH-JS

Dear Judge Schneider:

Please accept this correspondence in lieu of a formal motion given the time constraints involved in the relief requested. Defendants Talk Radio Network Entertainment, Inc. ("TRN-E") and Mark Masters respectfully request the Court to permit Mr. Masters to attend the settlement conference scheduled for May 28, 2014, via phone and excuse his physical presence so he need not make the flight from Oregon to New Jersey and back again. TRN-E's executive vice-president, Ron Severaid, who will attend the conference, has full authority to settle the case and bind TRN-E with his signature.

Mr. Masters was initially hesitant to schedule the trip given a chronic back problem. Unfortunately, since the conference was set, Mr. Masters' has suffered a great deal of back pain and feels he is physically unable to make the trip. In fact, Mr. Masters believes he may have to be immobilized, as has happened before, if he is required to fly back and forth across the country. As confirmed in the attached letter from Mr. Masters' therapist, he is suffering from a herniated disc in his lower back. As stated, travel at this time "could result is a serious relapse and further damage his lower back."

Mr. Severaid is authorized to settle this matter, and Mr. Masters is available via phone throughout the settlement conference. Mr. Masters' actual presence is not essential, and the travel required will exacerbate an already painful medical situation. Counsel for Plaintiffs have advised the undersigned that this request is opposed and have asked that the attached email exchange be submitted with this letter. If the Court requires further information to rule on this

matter, please advise undersigned counsel at (571) 296-8450 and I will arrange a conference call with Plaintiffs' counsel.

Respectfully submitted,

/s/ John M. Shoreman

John M. Shoreman
pro hac vice Counsel

/s/ Athan T. Tsimpedes

Athan T. Tsimpedes
1920 N Street, NW, Suite 300
Washington, DC 20036
(202) 464-9910
Counsel for Defendants

cc: Christian S. Molnar, Esq. (via e-mail)
Tim J. McIlwain, Esq. (via e-mail)

Radiant Family LLC

228 NW B Street
Grants Pass, OR 97526
(541) 244-0111
www.theradiantfamily.com

To all concerned,

I am a practitioner of Therapeutic Process at Radiant Family LLC. I have worked with Mark Masters for chronic lower back issues for several years.

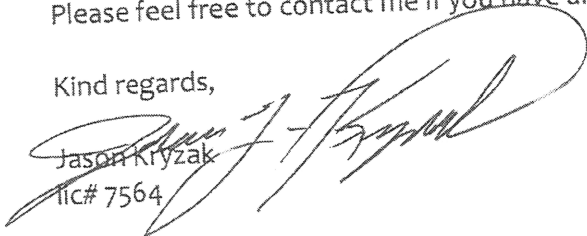
Having been Mark Master's therapist consistently for so many years, I am deeply concerned that Mr. Masters cannot travel by plane in his current condition. He suffers from trouble with a herniated disc in his lower back. In the past, he has suffered relapses in his progress due to plane travel and long trips.

Currently, his state of health warrants concern over traveling long hours. Past incidences of his having traveled in a state similar to this have resulted in his needing emergency care and being unable to work. For the sake of his health, I cannot recommend Mr. Masters do any plane travel or long seated journey at this time. Doing so could result in a serious relapse and further damage to his lower back, and a negative cascade event of other health issues.

Please feel free to contact me if you have any questions.

Kind regards,

Jason Kryzak
lic# 7564

A large, stylized handwritten signature in black ink, which appears to read "Jason Kryzak". The signature is written over the printed name and license number.



Verizon Message Center

Friday, May 23 at 3:12 PM

From: Christian Molnar <christian@christiansmolnarlaw.com>

To: "jmshoreman@verizon.net" jmshoreman@verizon.net, "attorney@Mcilwain.com" attorney@Mcilwain.com

Cc: Ashley Hunt, "Joey Cane Work (jcane@businesslpc.com)"

Subject: RE: Astero v. TRNE

John:

Our position remains unchanged from the telephonic settlement conference, we firmly believe that Mr. Masters should be present, in-person at the Settlement Conference on Wednesday, May 28, 2014, at 10:00 a.m., and question the efficacy of Defendants proposing to send only a Non-Party, Mr. Severaid. We have already booked non-refundable airfare and hotel accommodations and our client, Ms. Tantaros, has taken the time off of both of her shows on Fox and made travel arrangements to be there in-person on the long-scheduled date. While I sympathize with Mr. Master's back issues, unless they are life threatening or so painful as to be subject of a doctors written instructions not to travel, we must respectfully take the position that he should be there and in-person. The day in questions happens to be my birthday but there was never any question that I would and will be there. I am not in any way trying to be cavalier here in my position, simply attempting to ensure that we have the players present and in-person to maximize the potential for a successful resolution of the case next Wednesday.

I trust that you will convey our position to the court and provide it with a copy of this email.

Cordially,

Christian S. Molnar, Esq.

CHRISTIAN S. MOLNAR LAW CORPORATION
12400 Wilshire Boulevard, Suite 1180
Los Angeles, California 90025

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From: jmshoreman@verizon.net [<mailto:jmshoreman@verizon.net>]

Sent: Friday, May 23, 2014 10:24 AM

To: Christian Molnar; attorney@Mcilwain.com

Subject: Astero v. TRNE

Christian and Tim:

My clients hope to get their comments on the proposed settlement agreement back to you over the weekend. In the meantime, I am advised that Mark Master's back problem is seriously aggravated and he cannot fly back and forth to New Jersey. Please let me know if you will consent to his participation next Wednesday via phone. Ron Severaid will be in attendance and has full authority to settle this dispute. I need to take this to Judge Schneider today so please let me know.

Yours,

John

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